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Plaintiff in Pro Per

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

MARC WOLSTENHOLME,
Plaintiff,
vs.
RIOT GAMES, INC.,
Defendant

CASE NO. 2:25-CV-00053-FMO-BFM HON.

Hon. Fernando M. Olguin

DECLARATION OF MARC
WOLSTENHOLME

NOTICE OF RECEIPT OF POTENTIAL
HARASSMENT AND IMPROPER
COMMUNICATIONS AND PLAINTIFF'S
STATEMENT REGARDING SETTLEMENT
CONFERENCE CONFIDENTIALITY.

Dated this: April 28, 2025

M. WOLSTENHOLME

[MARC WOLSTENHOLME]

1 **NOTICE OF RECEIPT OF HARASSMENT AND IMPROPER**
2 **COMMUNICATIONS AND PLAINTIFF’S STATEMENT REGARDING SETTLEMENT**
3 **CONFERENCE CONFIDENTIALITY.**
4

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6 Plaintiff Marc Wolstenholme respectfully submits this Notice to inform the Court
7 of concerning communications received following recent filings in this action.
8

9 On April 28, 2025, Plaintiff received an unsolicited and anonymous email via a
10 submission form on Plaintiff’s website. The message contained hostile and threatening language
11 criticizing Plaintiff’s filings and purporting to threaten financial penalties and other
12 consequences. The persistent hate mail pressure follows closely behind pressurised and harassing
13 conduct of Riot’s legal team, showing a design attack.
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18 The pattern of communications appear to reflect an intimate awareness of the
19 details of this litigation and is clearly intended to intimidate, harass, and interfere with Plaintiff’s
20 prosecution of his claims. This is not just Riot’s adolescent cult, threatening the same as Riot’s
21 Legal team have in emails.
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1 **Email 1 - 25 Apr 2025, 19:45 (3 days ago)**

2 “Mr. Wolstenholme,

3 *Riot intends to move to strike Dkt. 108 because it is an improper “surreply.”*

4 *Briefing is closed on Riot’s motion to bifurcate, and you already filed your opposition on April 6*
5 *(Dkt. 85). Accordingly, this pleading is improper and should be stricken.*

6 *Riot also intends to move to strike Dkt. 107 because it improperly discloses*
7 *settlement communications from Riot and communications with the Magistrate Judge during the*
8 *settlement conference, which is improper.*

9 *Please advise if you are willing to meet and confer telephonically regarding these*
10 *anticipated motions and provide your availability to do so pursuant to L.R. 7-3. If you are not*
11 *willing to meet and confer, please let me know that and we will proceed with the motions.*

12 *Sincerely,*

13 *Josh Geller”*

14 Subject: Re: Meet and Confer Regarding Dkts. 107 and 108

1 **Email 2- 25 Apr 2025, 21:05 (3 days ago)**

2 *“Dear Mr. Geller,*

3 *I am willing to meet and confer under Local Rule 7-3.*

4 *However, I note that Dkt. 107 concerns judicial conduct, due process violations,*
5
6 *and alleged misconduct during the settlement conference, which are not protected under*
7 *settlement confidentiality rules when alleging judicial impropriety. Disclosure in this context is*
8 *proper.*

9 *Regarding Dkt. 108, while I understand your position, as a pro se litigant, I*
10 *submitted additional evidence necessary to correct misrepresentations and to fully preserve the*
11 *record given the serious procedural irregularities that have occurred.*

12 *I am available for a telephonic meet and confer 04:00 Friday 2nd, in Los Angeles,*
13 *CA, USA, which is 11 am in the UK, however I could make other UK business hour times as you*
14 *have been making use of exhausting me than abusing and harassing late at night.*

15 *I am willing to make reasonable adjustments, yet please do not harass with back*
16 *and forward emails.*

17 *Sincerely,*

18 *Marc Wolstenholme”*
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1 The court and Judge should be informed of these matters because it evidences a
2 well-documented pattern of insider information and the same wording post court events or
3 filings, with lies and misinformation and clearly intended to cause harm. In previous filings the
4 Plaintiff has shown that some of the past messages have come directly from Riot Games,
5 Fortiche Production SAS and Goblin Studios Paris.
6

7 Moreover, Riot Games has a long history of retaliations and harassment when
8 vulnerable people have spoken up against their abuses, and some of this has been exposed to be
9 online and masked. Moreover, even if this is just members of Riot's cult like following, Riot has
10 a duty to denounce the behaviours, but silence shows their complicity.
11

12 The Plaintiff has no evidence directly identifying the sender but notes that the
13 content and timing suggest a connection to parties monitoring this case. Plaintiff raises this issue
14 out of an abundance of caution to ensure that the Court is aware of potential efforts to improperly
15 influence or intimidate a party to this proceeding.
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17 These behaviors align with gaslighting and manipulation of proceedings; to make
18 the Plaintiff look "Mad" and to make him inform the court, right after Riot fires off many
19 repetitive motion filings, so the court gets tired of the docket being clogged up thus makes
20 rulings not on merit but on frustration.
21

22 Plaintiff respectfully seeks any guidance the Court may wish to provide regarding
23 this matter. Plaintiff remains committed to litigating this case respectfully and on its merits and
24 respectfully requests the Court's protection against improper harassment.
25

1 A copy of the communication, redacted to remove personal information, is
2 attached hereto as Exhibit 1.

3 *“13:57 (45 minutes ago)*

4 *to me*

5 *Sent via form submission from M.W. Wolf’s Megaverse*

6 *Email: ohmygod@ohmy.com, accepts marketing: false*

7 *Message: Oh my god.*

8 *You fucked it up. You fucked it up so extremely bad, and you don't even realize*
9 *how screwed you are now because of your own stupidity.*

10 *Settlement conference are CONFIDENTIAL AND NON-BIDING. By filling not*
11 *one, but several motions (including a fucking motion to compel (!) based on what was said and*
12 *shown in the conference, you just incurred in a grave procedural misconduct.*

13 *If you are extremely lucky, the documents will be stricken. If not, you will be fined*
14 *up to 10K .*

15 *And I really hope you are not lucky.”*

PLAINTIFF'S STATEMENT REGARDING SETTLEMENT

CONFERENCE CONFIDENTIALITY

The Plaintiff respectfully submits the following in response to concerns regarding the confidentiality of the settlement conference proceedings:

The Plaintiff has not disclosed confidential settlement negotiations (There were none), offers, or statements made for the purpose of compromise, nor has Plaintiff sought to use settlement communications improperly in violation of Federal Rule of Evidence 408 or equivalent provisions.

Instead, Plaintiff's filings and statements properly address allegations of misconduct by Defendant Riot Games and its counsel, including:

Presentation of false or misleading evidence on ambush during the settlement conference;

Bad faith conduct intended to mislead both Plaintiff and the Court;

Attempts at intimidation and manipulation through Riot Games' wider community and external communications.

1
2 It is well-established that confidentiality protections surrounding settlement
3 negotiations do not shield acts of fraud, misrepresentation, abuse, or other misconduct. Courts
4 have repeatedly recognized that:
5

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7 “Confidentiality rules applicable to settlement discussions are designed to protect
8 legitimate compromise efforts, not to cloak fraudulent or abusive conduct from judicial review.”
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10 See, e.g., *United States v. Dish Network, L.L.C.*, 954 F.3d 970, 977 (7th Cir.
11 2020); *In re Grand Jury Subpoena*, 220 F.R.D. 130 (D. Mass. 2004).
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13 Thus, allegations of bad faith, fraud, and misconduct — even when they arise
14 during a settlement conference — may properly be brought to the Court’s attention and are not
15 protected communications under settlement confidentiality doctrines.
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18 Accordingly, Plaintiff respectfully asserts that his disclosures relate solely to
19 serious concerns about improper conduct that, if left unaddressed, could compromise the
20 integrity of these proceedings. Plaintiff remains committed to abiding by the Court’s
21 confidentiality orders and settlement rules in good faith but cannot allow serious misconduct to
22 go unexamined under the guise of confidentiality.
23

Declaration of Authenticity:

I, Marc Wolstenholme, declare under penalty of perjury that the statements made are true and accurate

Executed on April 28, 2025, in Coventry, England.

Respectfully submitted,

Signature: *M. WOLSTENHOLME.*

Marc Wolstenholme

Plaintiff in Pro Per

5 Shetland Close

Coventry, England CV5 7LS

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